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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

01-RCA-244

APR 06 2001

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P. O. Box 47600
Olympia, Washington 98504

RECEIVED
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EDMC

Dear Mr. Wilson:

**TRANSMITTAL OF ADDITIONAL INFORMATION TO SUPPORT THE M-091-03
PROJECT MANAGMENT PLAN (PMP) FOR TRANSURANIC/TRANSURANIC MIXED
(TRU/TRUM) WASTE**

On March 29, 2001, the U.S. Department of Energy, Richland Operations Office (RL) delivered to the State of Washington Department of Ecology (Ecology) a draft submittal of the M-91-03 PMP via letter 01-RCA-225. RL committed to provide a follow-up package containing a Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change request (as part of the PMP) and developmental budget information, which is not part of the PMP.

RL is submitting a draft copy of the Tri-Party Agreement change request (Attachment 1). RL believes there are two issues requiring additional discussion prior to finalizing this change request. First, additional discussion is required in order to obtain agreement by both RL and Ecology on the completion criteria for Tri-Party Agreement Target Date M-91-08-01T. Second, RL believes this is an opportune time to renegotiate all of the M-91 series of milestones. In addition to the change request, RL is submitting life cycle budget information (Attachment 2) concerning capital and operating expenses for the waste streams identified in the M-91-03 PMP. Because of uncertain funding in fiscal year 2002 and out-years, the actual estimated budgets are anticipated to vary greatly from this data. The budget information is not to be considered part of the PMP, and should be utilized to provide a rough order of magnitude of estimated costs for the projects described in the PMP.

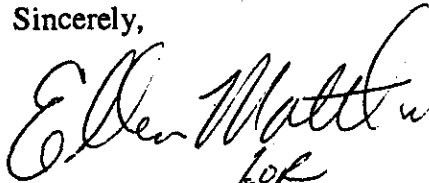
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RL looks forward to working with Ecology on developing an integrated waste management strategy for TRU/TRUM and other waste streams and invites further comment on the PMP and change request in order to resolve this dispute prior to the April 24, 2001, IAMIT. If you have any questions or need more information, please contact me at (509) 376-9333, or Ellen Dagan, of my staff, at (509) 376-3811.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clifford E. Clark".

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

RCA:TAS

Attachments

cc w/attachs:

J. H. Richards, CTUIR
L. Cusack, Ecology
F. Jamison, Ecology
R. F. Stanley, Ecology
D. R. Sherwood, EPA
E. S. Aromi, Jr., FHI
K. L. Hladek, FHI
J. S. Hertz, FHI
O. S. Kramer, FHI
D. E. McKenney, FHI
E. Murphy-Fitch, FHI
R. E. Piippo, FHI
T. M. Martin, HAB
P. Sobotta, NPT-
M. L. Blazek, Oregon Energy
R. Jim, YN
Admin Record, H6-08

Change Number Draft M-91-00-XX	Federal Facility Agreement and Consent Order Change Control Form Information is negotiation sensitive	Date April 4, 2001
Originator Helen E Bilson		Phone (509) 376-6628
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Revise M-91 milestones associated with the treatment, storage, and disposal (TSD) facilities for transuranic (TRU) and transuranic mixed (TRUM) waste streams.		
Description/Justification of Change This change request is based on a Preliminary Technical Baseline described in the <u>Project Management Plan for TRU/TRUM per Tri-Party Agreement M-91-03 (PMP)</u> . The PMP describes the basis to process CH and RH TRU/TRUM waste.		
Impact of Change This change request clarifies two Target Dates and delays three Target completion dates and adds one new annual Interim Milestone and one new Target Date to ensure acquisition of the capabilities for the storage/treatment of TRU/TRUM waste.		
Affected Documents <u>Hanford Federal Facility Agreement and Consent Order</u> , DOE's Annual Land Disposal Restrictions Report to the extent TRUM is addressed; as amended, Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, Multi Year Work Plans, Sitewide System Engineering control documents, Project Management Plans and the Hanford Site Integrated Priority List).		
Approvals		
_____ DOE	_____ Date	____ Approved ____ Disapproved
_____ N/A EPA	_____ Date	____ Approved ____ Disapproved
_____ Ecology	_____ Date	____ Approved ____ Disapproved

The project schedule presented in the PMP depicts a schedule for decision points for the acquisition of facilities to process remote handled and large size TRU/TRUM.

Justification for acquisition schedule

- Although all of the waste within the scope of this project is currently managed as TRU waste, with additional characterization and records review, a significant portion may prove to actually be non-TRU waste. This will have an influence on planning facility capacity and throughput.
- The WIPP Waste Analysis Plan (WAP) and Waste Acceptance Criteria (WAC) for RH waste are not yet issued. Design of the RH waste treatment capability prior to finalization of the WIPP-WAP/WAC would substantially increase the cost and schedule risk to the project. The risks associated with implementing the project will be mitigated by coordinating the RH project with the WIPP-WAP/WAC.
- The SW-EIS ROD, expected to be issued in calendar year 2002, will address the retrievably stored TRU and will be a key NEPA document for the M-91 project.
- Much of the waste within the scope of this project has not yet been generated; the forecast involves significant uncertainties in quantities, characteristics, and timing. Acquisition of facilities prior to generation or retrieval inserts considerable risk in selecting the proper treatment/processing technology.

Description of the milestones

The delay of the Target Dates and the description of the new annual Interim Milestone for the acquisition of retrieval, storage, and treatment capacity for M-91 TRU/TRUM waste are described in the following table. The annual Interim Milestone will allow Ecology to effectively track RL progress to completion of the activities described in the M-91-03 PMP. The change in the description of Target Date M-91-05-T01 and addition of Target Date M-91-17-T01 is to reflect that the Engineering Study and Functional Design Criteria are separate documents that will be produced and submitted approximately 1 year apart. The change in Target Date M-91-08-T01 reflects the uncertainty of the need for construction of a new facility. Strikeout indicates text to be deleted; shading text is to be added.

- 1 The Target Date delays and annual Interim Milestone established by approval of this change request are
 2 hereby incorporated to the TPA.

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-91-05-T01	Complete and submit TRU/TRUM retrieval and processing facility Engineering Study/Functional Design Criteria Study to Ecology. The TRU/TRUM engineering/functional design criteria study will cover activities/facilities not considered commercially viable as documented in the approved TRU/TRUM PMP and associated Agreement change requests.	12/31/2002 9/30/2005
M-91-06-T01	Award necessary privatized contracts for processing remote handled (RH) and large size TRU/TRUM.	9/30/2003 9/30/2006
M-91-08-T01	Complete construction and initiate hot operations of RH and large size TRU/TRUM processing facility. (A final acquisition schedule for this facility will be established as an interim milestone no later than December 2000.)	6/30/2005 9/30/2012
M-91-16A	Submit to Ecology an annual report of the progress of activities described in the TRU/TRUM Project Management Plan. This milestone will be renewed annually and be due on 10/31 of each year.	10/31/2002
M-91-17-T01	Complete and submit TRU/TRUM retrieval and processing facility Functional Design Criteria Study to Ecology. The TRU/TRUM functional design criteria study will cover activities/facilities not considered commercially viable as documented in the approved TRU/TRUM PMP and associated Agreement change requests.	9/30/2006

LIFECYCLE COST BASELINE FOR TRU/TRUM FACILITIES AND OPERATIONS

The following table provides rough cost estimates to the activities described in the M-91-03 Project Management Plan for RH and large item TRU. The cost data is outdated but the best available at this time and should not be considered a committed cost. Significant changes are anticipated upon receipt of new budget guidance from DOE-HQ and subsequent development of the new Fluor Hanford, Inc. Baseline in June of 2001.

Operations Cost	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017-2046
K Basins Sludge Support	4,802	2,505	3,309	3,309	3,309	3,309	0	0	0	0	0	0	0	0	0	0	0
T Plant	8,932	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	8,034	152,646
T Plant Life Extensions/Upgrades	82	1,748	5,782	510	500	500	500	500	500	500	500	500	500	500	500	500	9,500
Retrieve CH TRU	0	1,679	2,552	5,096	5,655	8,303	8,323	4,568	4,568	4,568	4,568	4,568	4,568	4,473	0	0	0
Retrieve RH TRU	0	0	0	0	0	263	568	1,349	1,152	0	0	0	0	0	0	0	0
Construct RH TRU/TRUM Processing Facility	0	0	0	0	0	718	2,137	0	0	0	0	0	8,216	8,216	8,216	8,216	139,672
Maintain WRAP Facility Readiness	14,767	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	16,358	245,370
Provide WRAP Life Extensions/Upgrades	0	202	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Capital Cost																	
Retrieve RH TRU	0	0	0	0	0	0	0	0	0	6,069	15,444	16,000	0	0	0	0	0
Construct RH TRU/TRUM Processing Facility	0	0	0	0	0	0	0	7,057	15,758	17,465	13,708	8,000	0	0	0	0	0